

MORVILLO ABRAMOWITZ GRAND IASON & ANELLO P.C.

ELKAN ABRAMOWITZ
RICHARD F. ALBERT
ROBERT J. ANELLO*
KATHLEEN E. CASSIDY
BENJAMIN S. FISCHER
CATHERINE M. FOTI
CHRISTOPHER B. HARWOOD
LAWRENCE IASON
BRIAN A. JACOBS
TELEMACHUS P. KASULIS
KAREN R. KING
THOMAS A. MCKAY
ROBERT M. RADICK*
JONATHAN S. SACK**
EDWARD M. SPIRO
JEREMY H. TEMKIN
RICHARD D. WEINBERG

565 FIFTH AVENUE
NEW YORK, NEW YORK 10017
(212) 856-9600
FAX: (212) 856-9494

www.maglaw.com

WRITER'S CONTACT INFORMATION

espiro@maglaw.com
(212) 800-9460

SENIOR COUNSEL

PAUL R. GRAND

COUNSEL

JASMINE JUTEAU

ROBERT G. MORVILLO

1938-2011

MICHAEL C. SILBERBERG

1940-2002

JOHN J. TIGUE, JR.

1939-2009

* ALSO ADMITTED IN WASHINGTON, D.C.

** ALSO ADMITTED IN CONNECTICUT

May 7, 2024

VIA ECF & EMAIL

Honorable Analisa Torres
U.S. District Court for the Southern District of New York
Daniel Patrick Moynihan United States Courthouse
500 Pearl Street, Room 2210
New York, New York 10007-1312

Re: *Doe v. Portnow, et al.*, 24 Civ. 345 (AT)

Dear Judge Torres:

We are attorneys for Defendant Neil Portnow in the above-referenced action and, as set forth in the letter filed today by Defendant National Academy of Recording Arts & Sciences, Inc. (Dkt. #40), write to respectfully ask this Court to allow us time to further review Plaintiff's Request for Voluntary Dismissal Without Prejudice (Dkt. #37). Specifically, we request that the Court allow us until Tuesday, May 14, 2024, to provide Mr. Portnow's position with respect to Plaintiff's request and that the Court take no action regarding that application prior to that date.

Furthermore, we respectfully request that the Court stay the pending deadlines in the interim, specifically, Mr. Portnow's May 9, 2024 deadline to answer the Amended Complaint and the parties' May 13, 2024 deadline to file a joint letter, proposed case management plan, and indication of whether they consent to proceed before a magistrate judge.

Thank you for Your Honor's consideration in this matter.

Respectfully yours,

Edward M. Spiro

Edward M. Spiro
Catherine M. Foti
Abbe R. Ben-David

cc: All counsel (by ECF)